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To: NIOSH Docket Office
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My comments on *NIOSH Interim Guidance on the Use of Chemical, Biological, Radiological and Nuclear (CBRN) Full Facepiece, Air-Purifying Respirators/Gas Masks Certified Under 42 CFR Part 84 CBRN APR User Guide* are in the attached file.

Dave

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<<Draft GasMaskGuidance Spelce.doc>>

COMMENTS ON

NIOSH Interim Guidance on the Use of Chemical, Biological, Radiological and Nuclear (CBRN) Full Facepiece, Air-Purifying Respirators/Gas Masks Certified Under 42 CFR Part 84 CBRN APR User Guide

David L. Spelce, MS, CIH
NAVENVIRHLTHCEN

Pages 4 and 5 - Contents do not match the text.

Note: Formatting issue.

Page 16, Under *Caution/Limitation "X,"* Change "Manufacturers" to "Manufacturers'."

Note: Typographical error.

Page 21, second to last sentence in last paragraph under *4. Service Life and Change Schedules,* change "Exponential" to "Experimental."

Note: Typographical error.

Pages 24 - 29 - Paragraphs *(1) Recommendations for CBRN APR Use Before a CBRN Incident Response* through *(2) Recommendations for CBRN APR Use After a CBRN Incident Response* are out of sequence.

Note: These paragraphs are incorrectly placed in the middle of the service life discussion, between paragraphs *7a. CBRN Respirator Use Life (CRUL)* and *7b. Software.* This five page discussion of what to do before, during, and after a CBRN Incident Response is good, but it does not belong in the middle of "service life." The *Table of Contents* does not address these topics. Recommend removing these pages from the service life section and provide a separate topic heading in the text and the *Table of Contents* for this information.

Page 29, *7b. Software* - The sixth paragraph, states *"a surrogate cannot be used for the acid gas family. This is because there are 5 TRA that represent the acid gas family, and it is not possible to input 5 chemicals at once into the software."*

Note: Is the reason that acid gas TRA cannot be used as a surrogate because acid gasses do not conform to the Wood's Equation in the software or is it as stated that it is not

possible to input five chemicals at once into the *OSHA Advisor Genius?* If service life of individual acid gases can be determined on the *OSHA Advisor Genius* then the breakthrough time could be calculated by OSHA's rules of thumb for mixtures. A discussion of determining service life for mixtures is available at the following website: http://www-nehc.med.navy.mil/ih/launches/CalChemCart.doc This is part of the NAVENVIRHLTHCEN Respirator Homepage at http://www-nehc.med.navy.mil/ih/Respirator/Resp_index.htm

Page 30, *8. Developing NIOSH CBRN Respirator Guidance* - Include the website for the respirator cleaning and sanitization instructions during the response to the World Trade Center attack, which NIOSH developed.